

THE COMMONWEALTH OF MASSACHUSETTS
OFFICE OF CONSUMER AFFAIRS AND BUSINESS REGULATION

**DEPARTMENT OF
TELECOMMUNICATIONS & ENERGY**

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October 8, 2004

Robert N. Werlin, Esq.
John K. Habib, Esq.
Keegan, Werlin & Pabian LLP
265 Franklin Street
Boston, MA 02110
FOR: Boston Edison Company
Commonwealth Electric Company

RE: Department's Second Set of Information Requests to Boston Edison Company and
Commonwealth Electric Company
NSTAR/MASSPOWER PPA Termination Agreement - D.T.E. 04-61

Dear Messrs. Werlin and Habib:

Enclosed please find the Department of Telecommunications and Energy's Second Set of Information Requests to Boston Edison Company and Commonwealth Electric Company in the above-referenced proceeding. Please provide the requested answers by October 15, 2004. If you have any questions on this request, please contact me at (617) 305-3613.

Sincerely,

/s/

Joan Foster Evans
Hearing Officer

cc. Mary L. Cottrell, Secretary
Service List
Staff as assigned

**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

**SECOND SET OF INFORMATION REQUESTS
D.T.E. 04-61**

Pursuant to 220 C.M.R. § 1.06 (6)(c), the Department of Telecommunications and Energy ("Department") submits to Boston Edison Company ("Boston Edison") and Commonwealth Electric Company ("Commonwealth") (jointly "NSTAR" or "Companies") the following Information Requests.

I. Instructions

The following instructions apply to this set of Information Requests and all subsequent Information Requests issued by the Department to the Companies in this proceeding.

1. Each request should be answered in writing on a separate three-hole punched page with a recitation of the request, a reference to the request number, the docket number of the case and the name of the person responsible for the answer.
2. Please do not wait for all answers to be completed before supplying answers. Provide the answers as they are completed.
3. These requests shall be deemed continuing so as to require further supplemental responses if the Companies or their witness receives or generates additional information within the scope of these requests between the time of the original response and the close of the record in this proceeding.
4. The term "provide complete and detailed documentation" means:

Provide all data, assumptions and calculations relied upon. Provide the source of and basis for all data and assumptions employed. Include all studies, reports and planning documents from which data, estimates or assumptions were drawn and support for how the data or assumptions were used in developing the projections or estimates. Provide and explain all supporting workpapers.
5. The term "document" is used in its broadest sense and includes, without limitation, writings, drawings, graphs, charts, photographs, phono-records, microfilm, microfiche, computer printouts, correspondence, handwritten notes, records or reports, bills, checks, articles from journals or other sources and other data compilations from which information can be obtained and all copies of such documents that bear notations or other markings that differentiate such copies from the original.
6. If the Companies find that any one of these requests is ambiguous, please notify the Hearing Officer so that the request may be clarified prior to the preparation of a written response.
7. If a question refers to an Information Request of another party, please provide that response and answer with information that supplements the previous response.

8. Please serve a copy of the responses on Mary L. Cottrell, Secretary of the Department; also submit two (2) copies of the responses to Joan Foster Evans, Hearing Officer, and one copy each to Sean Hanley, Mark Barrett, and James Byrnes of the Rates and Revenue Requirements Division, and Robert Harrold, Boris Shapiro, and Marilyn Ross of the Electric Power Division.

II. Information Requests

- IR-DTE 2-1 Refer to Information Response to DTE 1-1 (t), a letter dated March 26, 2004. In the third paragraph, there is reference to "the February 24 Concentric Letter." Please provide a copy of this letter.
- IR-DTE 2-2 Refer to Information Response to DTE 1-1 (t), a letter dated March 26, 2004. On the second page, third complete paragraph, there is reference to a "meeting on February 26th." Please provide all notes, correspondence, etc., relative to this meeting.
- IR-DTE 2-3 Refer to Information Response to DTE 1-1 (k) and (l). Please provide the answers to the attached questions.
- IR-DTE 2-4 Refer to Information Response to AG-1-21. What is the meaning of the acronym noted next to DOC4: "PCW" immediately prior to "GDP"?
- IR-DTE 2-5 Refer to Information Response to AG-1-21. Please provide the series extended back to the index year 1996.